

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

HOAU-YAN WANG,

Defendant.

Criminal Action No. TDC-24-211

VOIR DIRE QUESTIONS [DRAFT]

I. General Questions

1. This trial is estimated to take up to 13 days. The trial will take place from 9:00 a.m. to 5:00 p.m., starting today and running through November 17, 2025. Is there any substantial reason, whether personal, family, or employment related, that you cannot serve as a member of the jury in this case during that time period?
2. Do you have difficulty seeing or hearing, or have any physical condition, mental health condition, or any other medical issue that would prevent you from sitting as a juror in this case and giving your full attention to the evidence presented?
3. Do you have any difficulty understanding the English language to the extent that it would prevent you from following the testimony in this case?
4. Have you ever served as a juror in a criminal trial in either federal or state court? If so, was the jury able to reach a verdict? Is there anything about that experience that would affect how you would judge this case?
5. Have you ever served on a grand jury in either federal or state court?

6. Have you ever been a party or a witness in a lawsuit or a juror in a civil case? If so, please describe. Is there anything about that case that would affect how you would judge this case?

7. Have you or a member of your immediate family ever attended law school or received legal training?

II. Knowledge of the Case or Parties

8. This is a criminal case. In a federal criminal case, charges are brought in the name of the United States Government, represented by the United States Department of Justice, against a defendant, the person charged with a crime or crimes. In this case, the defendant is Dr. Hoau Yan Wang, and the case relates to allegations of fraud and false statements involving applications submitted to the National Institutes for Health for grant funding for development of an Alzheimer's drug. Have you read or heard anything about this case from any source?

9. Do you know, have you had any interactions with, or have you heard anything about the defendant, Hoau-Yan Wang, or any of the defendant's relatives, friends, or associates?

10. Do you know, or have you had any interactions with, one or more of the following persons associated with this case, or members of their families:

- a. Jennifer Beidel, Mark Chutkow, or Emma Blackwood, the attorneys who represent the defendant in this case;
- b. Department of Justice Attorneys Andrew Tyler, Vasanth Sridharan, or Kashan Pathan of the United States Department of Justice Criminal Division's Fraud Section, who are the prosecutors in this case; or
- c. Special Agent Jeffrey Weeks of the Federal Bureau of Investigation ("FBI"), who is the case agent in this case?

11. The United States Department of Justice Criminal Division, Fraud Section is led by Fraud Section Acting Chief Lorinda Laryea. Do you know Ms. Laryea, or any of the government Attorneys, or other employees of the Department of Justice?

12. Do you know, or have you had any interactions with, any of the following people who may be witnesses in the case or who may be mentioned during the trial: **(A witness list will be provided prior to jury selection, including city/state of residence or employment affiliation for each witness).**

13. Have you heard of Cassava Sciences, Inc.? Have you ever owned shares of Cassava Sciences stock?

III. History and Views on Issues in the Case

14. Have you or a member of your immediate family ever been employed by the United States Department of Justice, the United States Attorney's Office for the District of Maryland, the FBI, or any federal or state prosecutor's office or law enforcement agency?


15. In this case, the defendant is accused of major fraud against the United States, wire fraud, and making a false statement. Is there anything about the nature of the charges that causes you to believe that you cannot sit as a fair and impartial juror in this case?

16. Have you or a member of your immediate family ever been employed by any public defender service, law firm, investigative agency or other business which provides services to persons charged with or convicted of a crime? Do you have any opinions or views, favorable or unfavorable, about the credibility or truthfulness of law enforcement officers?


17. Would you be either more likely, or less likely, to believe the testimony of a witness who is a law enforcement officer just because of the witness's status as a law enforcement officer?

18. Do you have any feelings or opinions about the United States government in general, which would affect your judgment in this case?

19. Do you think you could be fair and impartial in weighing the evidence in a case in which the government is alleged to be a victim?

 20. Do you think merely because the defendant has been accused of crimes by the government, that he likely or must be guilty of those crimes?

21. Have you or a member of your immediate family ever:

-  a. Been the victim of a crime, a witness to a crime, or a witness for the prosecution or defense in any criminal trial;
- b. Been accused of, arrested for, or charged with a crime, or been the subject of a criminal investigation?

IV. Juror-Specific Characteristics

24. What is your current or most recent occupation and for how long?

25. What is your highest level of education? If you have post-college academic or professional degrees, what are they and in what fields?

26. Have you ever been a manager or supervisor in a workplace?

27. Have you ever been involved in academic, medical or scientific research? Or published papers in those fields?

28. Have you ever been involved in editorial review for professional publications?

29. Have you ever worked or been involved in the pharmaceutical or bioscience industries? Or in clinical or drug trials? Or at a higher education institution?

30. Have you or a member of your immediate family ever worked for Cassava Sciences, Inc., City University of New York (CUNY), the National Institutes of Health (NIH), the Food and Drug Administration (FDA), the Department of Justice (DOJ), or the Federal Bureau of Investigation (FBI)?

31. Have you ever worked as a government contractor or in a business that received grants or awards from the government?

32. Have you ever worked or been involved in seeking grants or contracts from federal, state, or local governments? Or worked or been involved as a reviewer of applications for grants or contracts?

33. Have you ever been involved in a forensic-related field such as work at a firm or business specializing in forensic investigations, auditing, or accounting?

34. Have you or a member of your immediate family ever suffered from Alzheimer's disease, or dementia? Have you followed the development of drugs to treat these diseases?

35. Where do you obtain your news—television, radio, newspapers, magazines, internet, social media, podcasts, or blog posts? For each media type you use, please identify the particular source of that news.

36. Do you have any beliefs or attitudes about persons who were born in China or Taiwan or anyone not born in the United States that would affect your ability to be a fair and impartial juror?

37. Do you have any views regarding legal immigration and the United States immigration system that may affect your ability to be a fair and impartial juror?

38. What civic, fraternal, professional, or community organizations do you belong to?

39. Do any of you have hobbies, and if so, what are they?

V. Ability to be Fair and Impartial

40. Do you have any views about criminal laws or the administration of justice that would prevent you from being fair and impartial in this case?

41. Do you have any deeply held beliefs which would prevent you from judging the conduct of another person?

42. At the end of the trial, I will instruct the jury on the law which must be followed in this case. You may have a different understanding of the law, or you may not agree with the law. Would you have any difficulty following my instructions on the law that applies in this case, even if you disagree with it?

43. Under our Constitution, there is a presumption that every person charged with a criminal offense is presumed innocent. Would you have any difficulty understanding this principle or applying it in this case?

44. In a criminal case, the burden rests with the prosecution to prove the defendant's guilt on each charged offense, and in order for a defendant to be convicted, the prosecution must prove each and every element of an offense beyond a reasonable doubt. The defendant does not have a burden to prove anything and you may not hold it against him if he chooses not to testify. Would you have any difficulty understanding these principles or applying them in this case?

45. Is there any other reason that you would not be able to serve as a juror or be fair or impartial in this case?

Date:

THEODORE D. CHUANG
United States District Judge